

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

ONE MANHATTAN WEST
NEW YORK, NY 10001

TEL: (212) 735-3000

FAX: (212) 735-2000

www.skadden.com

FIRM/AFFILIATE OFFICES

BOSTON
CHICAGO
HOUSTON
LOS ANGELES
PALO ALTO
WASHINGTON, D.C.
WILMINGTON

BEIJING
BRUSSELS
FRANKFURT
HONG KONG
LONDON
MOSCOW
MUNICH
PARIS
SÃO PAULO
SEOUL
SHANGHAI
SINGAPORE
TOKYO
TORONTO

DIRECT DIAL
212-735-2995
DIRECT FAX
917-777-2995
EMAIL ADDRESS
JOCELYN.STRAUBER@SKADDEN.COM


REQUEST GRANTED as to all defendants.

September 13, 2021

The time for defendants to submit pretrial motions is extended to September 27, 2021. Government's opposition briefs due by October 11, 2021. Defendants replies due by October 18, 2021. Motion Hearing rescheduled to October 21, 2021 at 12:00PM. The Court, with consent of all parties, excludes time from September 14, 2021 until October 21, 2021 pursuant to the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), upon a finding that the interest of justice outweighs the interest of the public and the defendants in a speedy trial,

Hon. Lewis J. Liman in that the time between now and October 21 can be used by the
U.S. District Judge defendants to consider and prepare motions, and for parties to discuss
Daniel Patrick Moynihan Courthouse a potential pretrial disposition. 9/14/2021
500 Pearl Street
New York, NY 10007

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

RE: United States v. Ortiz-Molina et al., 21-cr-173 (LJL)

Dear Judge Liman:

I represent Jeremy Ortiz-Molina in the above-captioned matter, in which pretrial motions are due today, based on the motion schedule that your Honor set at the June 23, 2021 status conference. I respectfully request an extension of approximately two weeks, to September 27, 2021, to allow additional time to consider potential motions or, in the alternative, to further discuss with the government a potential disposition of this matter. Jacqueline Cistaro, counsel for Pedro Carrasquillo, joins in this request. As of this afternoon, I had contacted but not yet heard back from Clay Kaminsky, counsel for Derek Ortiz Socias, with respect to this request. AUSA Jun Xiang has informed me that the government has no objection to this request.

This is the first request for an extension of time. We further request that the deadlines for the government's response and any reply, as well as any hearing, be adjusted accordingly, as follows: October 11, 2021 for the government's response, October 18, 2021 for any reply, and a hearing if necessary to be subsequently scheduled at a date and time convenient for the Court. The next conference (and hearing) date is currently scheduled for October 7, 2021.

Hon. Lewis J. Liman
September 13, 2021
Page 2

Respectfully submitted,

/s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Jun Xiang (via ECF)